

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: RENARDO JONES  
DEBTOR**

**CASE NO: 17-12901  
CHAPTER 13**

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**OBJECTION TO CLAIM FILED BY  
SETERUS, INC.**

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**COMES NOW** the debtor named above, by and through her attorney of record in this case, William L. Fava, and respectfully objects to the proof of claim filed in this case by Seterus, Inc. (hereinafter "Seterus") and in support hereof respectfully shows unto the Court the following:

1. Seterus filed a mortgage claim secured by debtor's residence.
2. Seterus listed the total arrearage owed through September 2017 of \$10,747.84.
3. Included in the arrearage claim was \$3,260.36 for Escrow deficiency for funds advanced and \$1,453.70 for Projected escrow shortage. Debtor disputes these amounts.
4. Seterus lists the ongoing mortgage payment as \$1,052.50. Included in this amount is \$246.68 for Monthly escrow and \$230.52 for Private mortgage insurance. Debtor disputes these amounts.

**WHEREFORE**, the debtor prays of the Court as follows:

- a. That the Court disallow the disputed amounts; and
- b. For any further relief the Court deems just and proper.

This the 8<sup>th</sup> day of December 2017.

Respectfully submitted,

/s/William L. Fava  
WILLIAM L. FAVA (MSB# 101348)  
Attorney for Debtor

MITCHELL, CUNNINGHAM & FAVA, INC.  
7165 Swinnea Rd., Bldg. A Ste. 1  
P.O. Box 783  
Southaven, MS 38671  
(662) 536-1116

**CERTIFICATE OF SERVICE**

I, William L. Fava, hereby certifies to the Court that to the extent any party was not served by the CM/ECF System, I have this day served a copy of the foregoing Objection on all parties in interest by placing the same in an envelope, first-class mail, postage prepaid, and addressed to each person at the place where he or she regularly conducts his business or profession as follows:

Locke D. Barkley  
Via ECF at [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

U.S. Trustee  
Via ECF at [USTPRegion05.AB.EDF@usdoj.gov](mailto:USTPRegion05.AB.EDF@usdoj.gov)

Seterus, Inc.  
P.O. Box 2008  
Grand Rapids, MI 49501-2208

Laura Henderson-Courtney – Attorney for Seterus, Inc.  
Via ECF

DATED: December 8, 2017

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/s/William L. Fava  
WILLIAM L. FAVA  
Attorney at Law

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